


INTEROFFICE CORRESPONDENCE

DATE: October 6, 1994

TO: D. L. Scott, Sanitary Waste Operations, Bldg. T130B, X5553

FROM:  N. S. Demos, Field Operations, Bldg. 080, X6938

SUBJECT: FINAL DISPOSITION FOR ELEVEN NON-HAZARDOUS DRUMS OF SOIL AND TWO DRUMS OF LIQUID GENERATED DURING SPILL CLEANUP ACTIVITIES AT BUILDING 974 - NSD-011-94

DOE Order: 5400.1

Action: Transfer drums to Environmental Restoration Program Division

Regarding your letter of September 27, 1994 and further review of analytical data to disposition eleven drums of soil and two drums of liquid generated during spill cleanup activities at building 974, we cannot provide signature concurring with your request to dispose of the drums at the Sanitary Landfill. Eventhough Waste Identification and Characterization (WIC) provided Characterization Advisory Report (dated September 6, 1994) as being non-hazardous for all thirteen drums, it is our position that Plutonium (Pu) data indicate that values are higher than plant background levels and are comparable to analytical data from surficial sampling within Individual Hazardous Substance Site (IHSS) 141 (Operable Unit 6).

The Sanitary Landfill (OU 11) is primarily a concern for Volatile Organic Compounds (VOCs), therefore it would not be in our best interest to remove soils from an IHSS of radiological concern to another IHSS with different potential contaminants (ie VOCs). Under these circumstances, we believe that the drums should be transferred to Environmental Restoration Program Division (ERPD) for management in accordance with CERCLA until all decisions are made final on IHSS 141.

If you have any question regarding this issue, please contact me at your earliest convenience.

cc:

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ERPD Project File (2)